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8	BEFORE THE BOARD OF REGISTERED NURSING				
9	DEPARTMENT OF CONSUMER AFFAIRS STATE OF CALIFORNIA				
10	In the Matter of the Accusation Against: Case No. 2010 - 289				
12	JENNIFER MAE ANTIN, aka JENNIFER MAE BROWN				
	17457 Tiara St. A C C U S A T I O N				
13	Encino, CA 91316				
14	Registered Nurse License No. 514473				
15	Respondent.				
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17	Complainant alleges:				
18	<u>PARTIES</u>				
19	1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her				
20	official capacity as the Interim Executive Officer of the Board of Registered Nursing (Board),				
21	Department of Consumer Affairs.				
22	2. On or about August 16, 1995, the Board issued Registered Nurse License Number				
23	514473 to Jennifer Mae Antin, aka Jennifer Mae Brown (Respondent). The Registered Nurse				
24	License was in full force and effect at all times relevant to the charges brought herein and will				
25	expire on March 31, 2011, unless renewed.				
26	<u>JURISDICTION</u>				
27	3. This Accusation is brought before the Board under the authority of the following				
28	laws. All section references are to the Business and Professions Code unless otherwise indicated.				
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STATUTORY PROVISIONS

- 4. Code section 2750 provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing Practice Act.
- 5. Code section 2764 provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under section 2811(b) of the Code, the Board may renew an expired license at any time within eight years after the expiration.
 - 6. Code section 2761 states:

"The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

- "(a) Unprofessional conduct, which includes, but is not limited to, the following:
- "(1) Incompetence, or gross negligence in carrying out usual certified or licensed nursing functions."
 - 7. California Code of Regulations, title 16, section 1442, states:

"As used in Section 2761 of the code, 'gross negligence' includes an extreme departure from the standard of care which, under similar circumstances, would have ordinarily been exercised by a competent registered nurse. Such an extreme departure means the repeated failure to provide nursing care as required or failure to provide care or to exercise ordinary precaution in a single situation which the nurse knew, or should have known, could have jeopardized the client's health or life."

COST RECOVERY PROVISION

8. Code section 125.3 provides, in pertinent part, that the Board may request the administrative law judge to direct a licentiate found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

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DRUG DEFINITION

9. Heparin Flush IV is an anticoagulant used to keep intravenous (IV) catheters open and flowing freely. Heparin helps to keep blood flowing smoothly and from clotting in the catheter by making an anti-clotting protein in the body work better.

SUMMARY OF FACTS

- 10. Since about October 1995, Respondent was employed as a registered nurse in the Pediatrics Unit (4NE) at Cedars-Sinai Medical Center (CSMC), Los Angeles. On or about November 18, 2007, while working the day shift from 0700 hours to 1500 hours at 4NE, Respondent was assigned to care for Patient #1, from about 1200 hours to 1500 hours, and Patient #2, from about 0700 hours to 1500 hours.
- 11. On November 18, 2007, Patient #1 and Patient #2, twins, were housed in the same room. Patient #1 was a 9-day old female infant admitted to 4NE on November 17, 2007 with a rash. Physician's order was for Acyclovir every 8 hours IV, and Vancomycin every 8 hours IV. Patient #2 was a 9-day old male infant admitted to 4NE on November 17, 2007 with a rash. Physician's order was for Acyclovir every 8 hours IV, and Vancomycin every 8 hours IV. Per hospital protocol, Heparin flush 10 units per milliliter is to be administered after the administration of IV medications.

Patient #2

12. On November 18, 2007, at about 1000 hours, Respondent administered Vancomycin to Patient #2. After the medication was completely infused, between about 1100 hours to about 1115 hours, Respondent retrieved a Heparin flush 10 units per milliliter from the medication room. After having verified the dosage, Respondent flushed Patient #2's IV line with the Heparin. Respondent failed to chart the administration of Heparin in the patient's medical file.

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CAUSE FOR DISCIPLINE (Gross Negligence)

- 13. Respondent is subject to discipline under Code section 2761, subdivision (a)(1) on the grounds of unprofessional conduct as defined under California Code of Regulations, title 16, section 1442, in that on or about November 18, 2007, while on duty as a registered nurse at 4NE at CSMC, Respondent was grossly negligent in her care of Patient #2 in the following respect:
 - a. Between about 1100 hours to about 1115 hours, Respondent administered a Heparin flush 10 units per milliliter after the infusion of Vancomycin, but did not chart in the patient file. Complainant refers to and incorporates all the allegations contained in paragraphs 10 12, as though set forth fully.

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

- 1. Revoking or suspending Registered Nurse License Number 514473, issued to Jennifer Mac Antin, aka Jennifer Mac Brown;
- 2. Ordering Jennifer Mae Antin, aka Jennifer Mae Brown to pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;
 - 3. Taking such other and further action as deemed necessary and proper.

DATED:	12/7/09	Louise & Bailey
<u> </u>	<i>-</i>	LOUISE R. BAILEY, M.ED., RN
		Interim Executive Officer
		Board of Registered Nursing
		Department of Consumer Affairs
		State of California

Complainant

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